

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.

Rulemaking 06-04-009
(Filed April 13, 2006)

**REPLY COMMENTS OF THE SOLAR ALLIANCE ON THE
INTERIM OPINION ON GREENHOUSE GAS REGULATORY
STRATEGIES**

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In accord with Rule 14.3 of the Commission's Rules of Practice and Procedure, the Solar Alliance¹ submits these reply comments on the February 8, 2008, Interim Opinion on Greenhouse Gas Regulatory Strategies (Proposed Decision or PD).

The Solar Alliance appreciates the opportunity to provide these reply comments on the implementation of AB 32, and the recommendations regarding the electric sector. The sheer volume and diversity of the initial comments filed demonstrates how complex, yet vital, this issue will be for the State of California. The Solar Alliance looks forward to participating in this proceeding as many of these difficult issues are addressed. These reply comments focus on the following topics: (1) the Solar Alliance supports CEERT's position that the Commission has

¹ The Solar Alliance is a national association of solar electric manufacturers, integrators, financiers and installers dedicated to accelerating the promise of solar energy in the United States, with a focus on fostering cost-effective policies and programs at the state level. Current members of the Alliance include American Solar Electric, Applied Materials, BP Solar, Conergy, Energy Innovations, Evergreen Solar, First Solar, Kyocera Solar, Mitsubishi Electric, MMA Renewable Ventures, PPM Solar, REC Solar, Sanyo Energy, Schott Solar, Sharp Electronics Corp.-Solar Energy Solutions Group, Solar City, Solaria, Solar Power Partners, Solar World, SPG Solar, Sun Edison, SunPower, Suntech, Trinity Solar, Uni-Solar and Xantrex.

not yet addressed or created a record on how a “deliverer” of renewable power that unbundles and sells the RECs associated with its generation should be treated in the context of GHG compliance, and, therefore, the PD’s discussion on this matter is premature; and (2) the Solar Alliance supports the CEERT’s position that renewable generators must be exempted from paying for allowances.

I. DISCUSSION

A. The Solar Alliance supports CEERT’s position that the PD’s discussion of “null power”² is premature, unsupported by the record and should be removed from the PD.

The Solar Alliance firmly agrees with CEERT that the PD’s dicta concerning “‘null power’ and the impact of tradable RECs is completely unsupported by any record in this proceeding and completely misses the point of the consideration being given to this issue in R.06-02-012. The only correct statement made by the Proposed Decision in this regard is that the Commission is considering whether to permit tradable RECs to be used for RPS compliance.”³

CEERT is correct that the only issue before the Commission at this time in any proceeding is whether tradable RECs should be used to meet RPS obligations. Any other forward-looking statements in the PD concerning “null power” are inappropriate at this time because parties have not had notice and an opportunity to comment on the on the treatment of how a “deliverer” of renewable power that unbundles and sells the RECs associated with its generation should be treated in the context of GHG compliance. Given the lack of an opportunity for parties to comment, the Commission has not developed a record sufficient

² “Null Power” is power generated by renewable resources that have transferred their renewable attributes through the trade or sale of RECs.

³ CEERT comments, p. 11.

enough to support any determination on the matter.

Lastly, as CEERT cogently explains, D.07-01-039 is instructive on a number of points, including finding that “stripping renewables of their emissions profiles in this manner could easily create a ‘perverse’ result” by discouraging renewable generation in favor of resources with higher emissions.⁴ As D.07-01-039 also noted, “[the] desirable GHG emission profiles do not physically disappear from the facility with the transfer of the REC.”⁵

Given this state of affairs, the Solar Alliance fully supports CEERT’s request that the PD’s statements concerning “null power” be removed. Those statements are premature and unsupported by the record.

B. Renewable Generators Must be Exempted from Paying for Allowances.

The Solar Alliance also agrees with CEERT that “renewable generators or first deliverers of renewable generation must be exempted, at the very least, from paying for allowances whether or not the electricity has been unbundled from its REC.”⁶

Stating the problem another way, IEP notes that: “[a]s presently drafted, the PD would require this renewable generator, a relatively low or zero emitting resource, to acquire allowances to cover its power generation as if it were a fossil-based resource. In addition to creating a nonsensical outcome (e.g., zero emitting resources having to enter the market for GHG allowances to cover their generation), it would have the effect of needlessly increasing the cost of renewable generation, in contradiction to the Commission’s policy.”⁷

The Solar Alliance firmly agrees that increasing compliance costs for clean

⁴ D.07-01-039, pp. 122, 124.

⁵ D.07-01-039, p. 124.

⁶ CEERT comments, p. 13.

⁷ IEP comments, p. 8.

CERTIFICATE OF SERVICE

I, Melinda LaJaunie that I have on this 4th day of March 2008 caused a copy of the foregoing:

**REPLY COMMENTS OF THE SOLAR ALLIANCE ON THE INTERIM
OPINION ON GREENHOUSE GAS REGULATORY STRATEGIES**

to be served on all known parties to R.06-04-009 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email and via U.S. mail to those without email service. I also caused courtesy copies to be hand-delivered as follows:

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 4th day of March 2008 at San Francisco, California.

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